



January 5, 2017

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Re: WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 16-271

Dear Madame Secretary:

I am writing to provide comment on the Federal Communication Commission's (Commission) Further Notice of Proposed rulemaking to address the elimination of duplicative funding where more than one competitive eligible telecommunications carrier is receiving high-cost support for the provision of 4G LTE wireless voice and broadband services in Alaska.

Chugachmiut is a non-profit health & social services organization that utilizes broadband heavily to deliver quality health and other vital services in the Chugach Region of Alaska. We provide services in Seward, Port Graham, Nanwalek, Chenega Bay and Tatitlek. In addition we collaborate closely with the two Chugach region communities of Valdez and Cordova (Eyak) in the provision of services.

I'm thankful that the Commission is aware of this issue and welcome action to correct an injustice to the many Americans living in rural Alaska. My sincere hope is that the Commission curtails duplicative support and absolutely recommend that the Commission seriously considers reallocation of monies to new, previously unfunded facilities.

Essentially, eliminating duplicative activities will force the linking the state's off-road communities to urban Alaska with adequate, affordable, competitive high-speed broadband capability, via a middle-mile network. As the Commission has stated and re-stated, Americans in rural areas are entitled to internet access similar in type and price as those living in urban American. Rural Alaskan's rights as American citizens will never be realized if the practice of wasteful spending on duplicative facilities continues. Funding new facilities and systems helps meet the Commission's Universal Service goals of promoting the availability of quality services at just, reasonable and affordable rates for all consumers and increasing nationwide access to advanced telecommunications services.



Middle-mile broadband network development and 4G LTE wireless voice is not complete in Alaska and certainly not in the rural areas of the Chugach Region. Strides are being taken to improve connectivity thereby improving communication but still falling short of stated FCC standards. Recent connectivity brought 4 Mbps/1 Mbps service to most Chugach Region communities including three of the four small remote communities. Chenega, Alaska remains on satellite broadband service due to its geographic remoteness. With this recent improvement in connectivity, wireless voice service experiences for 4G LTE are from good to intermittent to non-existent. Three of the rural communities in the Chugach Region have 2G coverage. Although sporadic, only one of the four small, remote communities enjoys 4G LTE. The small community that does receive 4G LTE does not have full coverage; residents experience 3G coverage in different parts of the community.

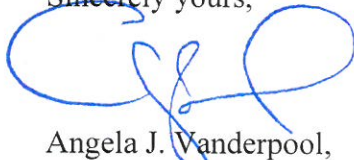
We know that Commission set a new broadband standard of 25 Mbps/3 Mbps; rural Alaskan regions are among the last to achieve a level of service established by the Commission and it is highly possible that we never will reach minimum standards if existing practices continue and conditions for receipt of public funds are not established.

To achieve FCC's standards as promised to rural America, build out the middle-mile broadband Network and 4G LTE wireless voice services has to take place. In absence of support to narrow the Alaska middle-mile gap, our rural health care clinics, schools, libraries, community centers, government offices, and local businesses and residents will remain unserved by modern, high-speed networks and our local community will lag behind the rest of the state and the nation.

We ask that you consider allocating monies spent on duplicative facilities, to an unserved, statewide middle-mile network, for the benefit of all Alaskans, delivering measureable improvements to the quality, reliability, capacity, and price of services available in remote Alaska.

Thank you for your attention to this matter and consideration of these comments.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Angela J. Vanderpool', with a large, stylized loop at the end.

Angela J. Vanderpool,
Executive Director